

January 16, 2003

Randy Scott, Plant Manager
Sunnyside Cogeneration Association
P.O. Box 159
Sunnyside, Utah 84539

Re: Approval of Fire Suppression Soil, Sunnyside Cogeneration Association, Sunnyside
Refuse and Slurry, C/007/035-AM02A, Outgoing File

Dear Mr. Scott:

The above-referenced amendment is conditionally approved upon receipt of three (3) clean copies for incorporation. Once we receive these copies, we will send a stamped incorporated copy to you for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed for your information.

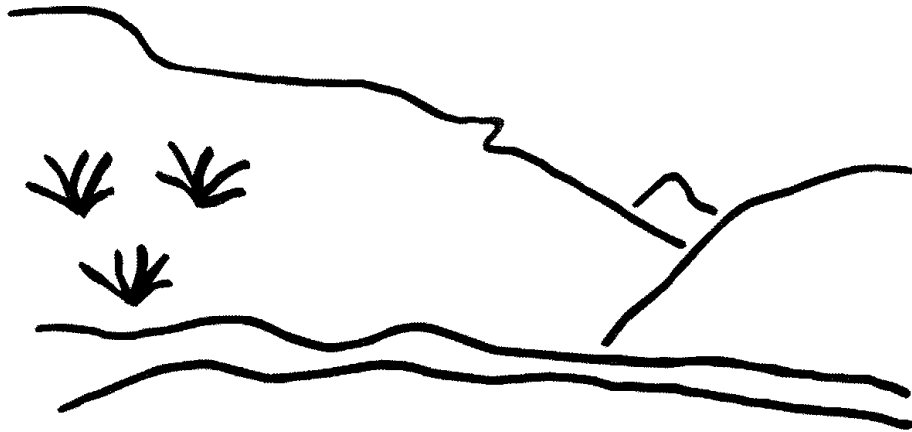
If you have any questions, please call me at (801) 538-5268 or Karl R. Houskeeper at (435) 613-5330.

Sincerely,

Pamela Grubaugh-Littig
Permit Supervisor

KRH/sd
Enclosure
cc: Price Field Office
O:\007035.SRS\FINAL\COND_APP02A.DOC

State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Sunnyside Cogeneration Associates
Fire Suppression Soil Cover Material
C/007/035-02A
Technical Analysis
January 13, 2003

TECHNICAL ANALYSIS

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The Division regulates the Surface Mining Control and Reclamation Act of 1977 (SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

INTRODUCTION

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The Permittee has immediate access to a large volume of clean spoil for fire suppression. In the unlikely event that the supply of clean spoil on site is not adequate for fire suppression, the Permittee proposes to import soil to the site. The material to be imported was not identified, but Division approval for the importation would be sought on a case-by-case basis.

OPERATION PLAN

OPERATION PLAN

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Burning And Burned Waste Utilization

A revision of the mining and reclamation plan included a statement that coal mine waste fires would be extinguished by covering with either clean spoil from the Excess Spoil Area or with “approved soil materials imported from off site” (page 500-20). The Permittee anticipates importing soil only in the case of a fire that cannot be put out with the large volume of clean spoil already available on site. In that case, Division approval would be sought in advance for the importation of soil.

Findings:

The information provided is adequate for the purpose of managing burning waste.